

**FILED ELECTRONICALLY**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TRAVELERS PROPERTY CASUALTY  
COMPANY OF AMERICA a/s/o Ethical Culture  
Fieldston School and Ethical Culture Fieldston,

Case No. 07 CV 11178 (SHS)

ECF Case

Plaintiff,

**ANSWER TO TISHMAN'S  
CROSS-CLAIMS**

-against-

TISHMAN CONSTRUCTION CORPORATION  
OF NEW YORK, JOHN CIVETTA & SONS, INC.,  
AMBROSINO, DEPINTO, SCHMIEDER  
CONSULTING ENGINEERS, P.C., MUNOZ  
ENGINEERING & LAND SURVEYING, P.C.,  
COOPER, ROBERTSON & PARTNERS, LLP,  
and LANGAN ENGINEERING AND  
ENVIRONMENTAL SERVICES, INC.,

Defendants.  
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Defendant Ambrosino, DePinto & Schmieder Consulting Engineers, P.C., sued herein as Ambrosino, DePinto, Schmieder Consulting Engineers, P.C. ("ADS"), by its attorneys Milber Makris Plousadis & Seiden, LLP, as and for its answer to defendant Tishman Construction Corporation of New York's ("Tishman") Answer of Defendant Tishman Construction Corporation of New York dated February 6, 2008, states as follows:

**ANSWERING A FIRST CROSS-CLAIM AGAINST CO-DEFENDANTS**

1. Denies each and every allegation as to the liability of ADS, denies having knowledge or information sufficient to form a belief as to the truth of the allegations as to the remaining parties contained in paragraph 10 the cross-claim, and refers all questions of law to this Honorable Court.

2. Denies each and every allegation as to the liability of ADS, denies having knowledge or information sufficient to form a belief as to the truth of the allegations as to the

remaining parties contained in paragraph 11 the cross-claim, and refers all questions of law to this Honorable Court.

**ANSWERING A SECOND CROSS-CLAIM AGAINST CO-DEFENDANTS**

3. Denies each and every allegation as to the liability of ADS, denies having knowledge or information sufficient to form a belief as to the truth of the allegations as to the remaining parties contained in paragraph 12 the cross-claim, and refers all questions of law to this Honorable Court.

4. Denies each and every allegation as to the liability of ADS, denies having knowledge or information sufficient to form a belief as to the truth of the allegations as to the remaining parties contained in paragraph 13 the cross-claim, and refers all questions of law to this Honorable Court.

**ANSWERING A THIRD CROSS-CLAIM AGAINST CO-DEFENDANTS**

5. Denies each and every allegation as to the liability of ADS, denies having knowledge or information sufficient to form a belief as to the truth of the allegations as to the remaining parties contained in paragraph 14 the cross-claim, and refers all questions of law to this Honorable Court.

6. Denies each and every allegation as to the liability of ADS, denies having knowledge or information sufficient to form a belief as to the truth of the allegations as to the remaining parties contained in paragraph 15 the cross-claim, and refers all questions of law to this Honorable Court.

**ANSWERING A FOURTH CROSS-CLAIM AGAINST CO-DEFENDANTS**

7. Denies each and every allegation as to the liability of ADS, denies having knowledge or information sufficient to form a belief as to the truth of the allegations as to the

remaining parties contained in paragraph 16 the cross-claim, and refers all questions of law to this Honorable Court.

7. Denies each and every allegation as to the liability of ADS, denies having knowledge or information sufficient to form a belief as to the truth of the allegations as to the remaining parties contained in paragraph 17 the cross-claim, and refers all questions of law to this Honorable Court.

8. Denies each and every allegation as to the liability of ADS, denies having knowledge or information sufficient to form a belief as to the truth of the allegations as to the remaining parties contained in paragraph 18 the cross-claim, and refers all questions of law to this Honorable Court.

**WHEREFORE**, based on the foregoing, ADS demands judgment against defendant Tishman dismissing its cross-claims and for other and further relief the Court may deem just and proper.

Dated: White Plains, New York  
March 7, 2008

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